

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE LIBOR-BASED FINANCIAL INSTRUMENTS ANTITRUST LITIGATION	MDL No. 2262
THIS DOCUMENT RELATES TO:	Master File No. 1:11-md-2262-NRB ECF Case
THE BERKSHIRE BANK and GOVERNMENT DEVELOPMENT BANK FOR PUERTO RICO Individually and On Behalf of All Others Similarly Situated, Plaintiffs, v. BANK OF AMERICA CORPORATION, et al., Defendants.	Civil Action No. 12-CV-5723-NRB

**LENDER PLAINTIFFS' NOTICE OF MOTION FOR FINAL APPROVAL OF
SETTLEMENTS WITH JPMORGAN, BANK OF AMERICA AND UBS**

TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

PLEASE TAKE NOTICE, that on May 26, 2020, at 2:30 PM, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York 10007, in the Courtroom of the Honorable Naomi Reice Buchwald, Lender Plaintiffs will, and hereby do, move the Court, pursuant to Federal Rule of Civil Procedure 23(e), for an Order: (a) granting final approval to the Settlements with JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A. (collectively, “JPMorgan”) and Bank of America Corporation and Bank of America, N.A. (collectively, “BOA”) and UBS AG (“UBS”); (b) certifying the Settlement Class; (c) granting final approval to the plans of distribution; (d) appointing Pomerantz LLP as Counsel for the Settlement Class; (e) granting final approval to the class notice, and for such other and further relief as the Court deems appropriate.

Submitted herewith in support of Lender Plaintiffs’ Motion for Final Approval of Settlements with JPMorgan, BOA and UBS are: (i) the Memorandum of Law in Support of Lender Plaintiffs’ Motion for Final Approval of Settlements with JPMorgan, BOA and UBS; (ii) the Declaration of Jeremy Lieberman A. Lieberman in Support of Lender Plaintiffs’ Motion for Final Approval of Settlements with JPMorgan, BOA and UBS; (iii) the Declaration of Jennifer M. Keough in Support of Lender Plaintiffs’ Motion for Final Approval of Settlements.¹

Dated: April 21, 2020
New York, New York

POMERANTZ LLP

/s/ Jeremy A. Lieberman

Jeremy A. Lieberman

Michael J. Wernke

Veronica V. Montenegro

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¹ Lender Plaintiffs will submit a Proposed Order after the opt-out (April 21, 2020) and objection deadline (May 5, 2020) and in advance of the Fairness Hearing (May 26, 2020).

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*Counsel for Plaintiffs The Berkshire
Bank and The Government
Development Bank of Puerto Rico*

CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2020, I caused the foregoing, along with the accompanying memorandum and declarations in support, to be electronically filed with the Clerk of the Court using CM/ECF system, which will automatically send email notification of such filing to the attorneys of record registered in the CM/ECF system.

Dated: April 21, 2020.

/s/ Jeremy A. Lieberman
Jeremy A. Lieberman